

# Commercial Disposal Group: Hydrocarbon Liquid Unloading

## Proposed Language

### 20.2.50.120.A

Well sites, tank batteries, gathering and boosting stations, natural gas processing plants, or transmission compressor stations that load out hydrocarbon liquids to trucks fewer than thirteen (13) times in a calendar year **or have potential emissions of VOCs from loadout operations of less than 2 tpy** are not subject to 20.2.50.120 NMAC. When transferring hydrocarbon liquid from a transfer vessel to a storage vessel subject to the emission standards in 20.2.50.123 5 NMAC, no requirements under this Section apply. **Where air pollution control equipment is demonstrated to be technically infeasible, including but not limited to inability to operate without supplemental fuel, the owner or operator may apply to the NMED for an exemption from the control requirements of Section 20.2.50 NMAC.**

## Reason for Request

- Oil collected from water operations is less volatile and is considered “dead” oil
- Any benefit of controlling a handful of oil loadouts per month is diminished by the need to import supplemental fuel and burn pilot gas 24/7
- E&P facilities generally can route emissions from hydrocarbon liquid loadout back to the tanks or existing controls, while water facilities must retrofit facilities to accommodate combustors